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7 *Counsel for Plaintiffs*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF ARIZONA

10 In Re Bard IVC Filters Products
11 Liability Litigation

No. MD-15-02641-PHX-DGC

12 DORIS JONES and ALFRED JONES, a
13 married couple,

14 Plaintiffs,

15 v.

16 C.R. BARD, INC., a New Jersey
17 corporation and BARD PERIPHERAL
VASCULAR, an Arizona corporation,

18 Defendants.

**PLAINTIFF'S NOTICE OF
LODGING CERTAIN DOCUMENTS
UNDER SEAL REGARDING
PLAINTIFF'S MOTION FOR
RECONSIDERATION REGARDING
ADMISSIBILITY OF CEPHALAD
MIGRATION DEATH
COMPLICATIONS ASSOCIATED
WITH RECOVERY FILTER**

19
20 Pursuant to LRCiv 5.6(d), Plaintiff submits this Notice of Lodging Certain
21 Documents Under Seal regarding Plaintiff's Motion for Reconsideration Regarding
22 Admissibility of Cephalad Migration Death Complications Associated With Recovery
23 Filter.

24 Plaintiff provides notice that, pursuant to LRCiv 5.6(d), she has lodged with the
25 Court the documents listed on Exhibit A to this Notice.

26 Defendants contend that the documents listed in Exhibit A are confidential and
27 should be filed under seal. As required under LRCiv 5.6(d), Plaintiff certifies that on
28 April 23, 2018, the parties met and conferred in good faith and were unable to agree about

1 whether the documents are confidential under the Protective Order and should be filed
2 under seal. Plaintiff does not believe that the disputed documents warrant continued
3 confidential treatment as proprietary or sensitive trade secret information.

4 This dispute notwithstanding, the parties have agreed to continue to meet and
5 confer on the documents at issue.

6 RESPECTFULLY SUBMITTED this 23rd day of April, 2018.

7 GALLAGHER & KENNEDY, P.A.

8 By: /s/ Mark S. O'Connor

9 Mark S. O'Connor
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Newport Beach, California 92660

14 *Counsel for Plaintiff*

15
16 **CERTIFICATE OF SERVICE**

17 I hereby certify that on this 23rd day of April 2018, I electronically transmitted the
18 attached document to the Clerk's Office using the CM/ECF System for filing and
19 transmittal of a Notice of Electronic Filing.

20 /s/ Gay Mennuti

EXHIBIT A**UNREDACTED PLAINTIFF'S MOTION FOR RECONSIDERATION
REGARDING ADMISSIBILITY OF CEPHALAD MIGRATION DEATH
COMPLICATIONS ASSOCIATED WITH RECOVERY FILTER**

Exhibit	Description
A	4/13/18 Transcript of Proceedings Excerpts in <i>Booker v. Bard</i>
B	Representative Summary of Cephalad Migrations from Trackwise re Placement of G2 and Eclipse and Complaint Files
C	David Ciavarella Deposition dated November 12, 2013 Excerpts
D	9/30/2010 Memo from B. Baird re Eclipse Post-Market Design Review/Marketing Summary (BPVE-01-00545491)
E	Idea POA Eclipse Anchor Filter (BPVE-01-02077858)
H	Booker Trial Exhibit 1023 (BPVE-01-00324256)
I	Failure Investigations/R002 History Review (BPVEFILTER-01-00003802)
J	Booker Trial Exhibit 1008 – Memo dated February 13, 2004 from D. Uelmen regarding Filter Migration Meeting Minutes (BPV-17-01-00154052)
K	Len DeCant Deposition dated May 24, 2016 Excerpts
L	December 2004 Health Hazard Evaluation (BPVE-01-00245379)
M	Recovery Filter Migration Failure Investigation FIR-04-10-01 dated October 12, 2004 (BPV-17-01-00152963)
N	Remedial Action Plan dated April 6, 2004 (PBV-17-01-00153659)
O	Isolated Testimony from Bard's Objections to Deposition Designations
P	3/29/2018 Transcript of Proceedings Excerpt in <i>Booker v. Bard</i>